

Indictment

The Case Against the Reagan Environmental Record

Friends of the Earth
Natural Resources Defense Council
The Wilderness Society
Sierra Club
National Audubon Society
Environmental Defense Fund
Environmental Policy Center
Environmental Action
Defenders of Wildlife
Solar Lobby

March 1982

The Federal Public Lands and Natural Resources

Some 500 million acres of federal public land owned by all Americans—190 million in the National Forests and 328 million under the Bureau of Land Management—are required to be managed, under law, for multiple use, sustained yield of renewable resources, and long-term conservation. The Reagan Administration has tilted management away from conservation toward rapid development and control by private interests.

By accelerating the leasing of oil, gas, and coal on federal lands, without regard for demand and at royalty rates that are too low, the Reagan Administration is conducting a giveaway of the resources that belong to the nation.

It continues to subsidize the western livestock industry through grazing fees far below market value. It has adopted a new "Grazing Management Policy" and has proposed regulation changes that will allow ranchers to dominate—practically dictate—rangeland decisions. While passing effective control of publicly owned range to the livestock operators, the Administration is practically closing the door on government programs to benefit fish and wildlife and public recreation.

Ignoring both market realities and multiple use principles, President Reagan's Department of Agriculture has forced upon the Forest Service a policy of selling timber faster than it grows and of cutting timber on steep and arid lands where it should not be cut—all at an economic loss to the public, and damaging to wildlife, recreation, and watershed values. The Reagan policy not only subsidizes the timber industry, but gives it greater control over the National Forests.

The Administration set out to open the National Wilderness Preservation System to oil and gas drilling and mining—a goal blocked by Congress. Recently, proclaiming an intent to "protect" the wilderness areas, Secretary of the Interior James Watt recommended legislation that would open all wilderness to energy and minerals development after the year 2000. The Administration has signalled its clear intent to open to development lands being studied for wilderness designation, and to make certain there are no further major additions to the system.

Mr. Reagan himself has endorsed the goals of the "Sagebrush Rebellion" whose leaders have tried to get federal public lands turned over to the states and eventually to private ownership. Now the Administration has proposed to "privatize" large areas of National Forests and BLM lands by selling them to private interests.

Two other major systems of federal public lands, the National Parks and the National Wildlife Ref-

uges, are endangered by this Administration. While vowing to rehabilitate National Parks, Secretary Watt has systematically reduced the capability of the Park Service by cutting staff and funds for operations. He has tried to block further land acquisitions for the National Park System.

Likewise, he has tried to stop acquisition of National Wildlife Refuges, and has curtailed important activities of the Fish and Wildlife Service. His particular target for decimation has been the Endangered Species Program.

National Forests

Eighty years ago, President Theodore Roosevelt built the National Forest System on a strong foundation of conservation principles. The Reagan Administration is discarding this heritage. It is evading the express mandate of federal law to manage National Forests for many purposes, commercial and non-commercial. It is proposing an unbalanced, economically unsound, environmentally damaging program that would serve private timber and mining interests at the expense of broader public benefits.

Preamble

The conservation movement in this country had its origin in forest protection. Toward the end of the last century, rapacious "cut and run" commercial timbering left a legacy of scarred landscapes, erosion and floods. In response, publicly owned national forest reserves were established in 1891, and were greatly expanded and strengthened ten years later by President Theodore Roosevelt.

Congress has many times reaffirmed and strengthened the Roosevelt conservation policy for the National Forests. It has established a philosophy of management for sustained yield and multiple uses—outdoor recreation, range, timber, watershed, wilderness, and fish and wildlife habitat. In recent years, the Forest and Rangeland Renewable Resources Planning Act of 1974 created a long-term planning process to achieve those goals. Congress spelled out forest management guidance in more detail in the National Forest Management Act of 1976. With that law, Congress meant to stop abuses caused by dominant use of national forests for timber production, and to require greater attention by federal forest managers to resource protection and noncommodity uses.

Charges

The Reagan Administration is offering the timber industry a \$150 million-a-year subsidy for a timber sale that is too big, makes no sense economically, and threatens serious harm to the environment. The Administration's policy is to impose commercial resource extraction as the dominant use of the National Forests. It wants to undo years of professional planning for wise, balanced management of our National Forests—planning based on wide public participation and under standards prescribed by law. Moreover, President Reagan has put in charge of the nation's publicly owned forests a former timber industry executive and outspoken advocate of the industry's interests.

Subsidizing the Timber Industry. Despite a current low demand for timber and an all-time high backlog of sold but uncut timber in the National Forests, the Reagan Administration proposes to increase timber sales dramatically.

- The Reagan budget requests a timber sale from the National Forests of 12.3 billion board feet for FY 1983. That is 4 billion board feet higher than the amount cut last year. The excessive FY 1983 sale is planned despite the depressed housing industry and a record high backlog of approximately 34 billion board feet. The backlog amounts to more than three years' worth of average timber sales from the National Forests.
- The proposed timber sale conceals at least a \$150 million subsidy. The sale will cost the U.S. Treasury \$665 million (mostly for road construction). The Forest Service has in the past acknowledged that 22 percent of its timber sales are below cost. If these subsidized sales were eliminated, the sale could be reduced to a more realistic 9.6 billion board feet. Savings to the taxpayers would be \$150 million.
- The proposed sale is environmentally unsound. The budget for the sale shows \$585 million for road building, \$200 million more than in 1982. As the Reagan budget itself explains, the sharply higher cost is for roads in "difficult terrain" with "access problems." Forest Service research shows road construction is the prime cause of soil erosion, silting of streams, and damage to trout fisheries in the National Forests. Those problems are doubly acute in "difficult terrain."
- Some of the sales would be made in virgin areas of the National Forests that have never before had roads. Opening roads into them would remove them forever from possible designation as wilderness.

Federal sales below cost do not necessarily increase national supplies. In fact, they can unfairly compete with production for profit on private lands and discourage investments there.

Making Resource Extraction the Dominant Use. The wasteful expenditures for roads and subsidized timber sales robs the Forest Service of funds needed for other multiple use responsibilities. The Administration's FY 1983 budget request for the Forest Ser-

vice slashes funds for recreation, fish and wildlife, and watershed protection, while sharply increasing support for timber and mineral activities.

The Forest Service's 1980 long-term program was drawn up by professionals under the Resources Planning Act and was adopted by Congress, with some revision, in 1980. This current, Congressionally approved RPA Program gives balanced consideration to all the resources of the National Forests. The Reagan FY 1983 budget proposal skews the Forest Service's program planning out of all proportion. It meets or exceeds the goals for timber sales, mineral development, and livestock grazing, but cuts fish and wildlife management goals by 64 percent, trail construction by 90 percent, and soil and water protection by 99 percent.

Further examples are:

- The Reagan FY 1983 budget would cut trail maintenance by 30 percent from 1982 levels. Already, in the 1982 budget, maintenance was abandoned for 10,000 miles of the 100,000-mile trail system in National Forests. The further cut would mean that another 30,000 miles would be allowed to deteriorate.
- No allowance is made in the FY 1983 Reagan budget for wildlife habitat protection, except in timber sale areas.

The Osceola National Forest in Florida is a victim of the Reagan Administration's policy to sacrifice multiple uses of the public forests to resource extraction.

- After almost 10 years of opposing the issuance of leases for open pit mining of phosphate in the Osceola National Forest because of severe adverse impacts on wildlife, recreation, and air and water resources, the Department of the Interior and EPA have recently reversed their position. The Interior Department, which has the authority to issue those leases under the Mineral Leasing Act of 1920, is apparently disregarding existing regulations, as well as a 1981 solicitor's opinion, in processing the pending lease applications.

Frustrating the Reforms Imposed by Law. Changes proposed by the Reagan Administration in forest planning regulations are of dubious legality and will frustrate the reforms Congress called for in the National Forest Management Act. Regulations under the Act had been adopted in final form in 1979, after three laborious years of drafting, public comments, redrafting, and reaching a workable compromise among the many interests using the National Forests. Discarding that carefully crafted compromise, the Reagan Administration would

- Abandon sustained yield management to allow rapid increases in cutting the old, pristine forests in the Pacific Northwest. The law requires that departures from sustained yield management must be carefully controlled exceptions. Under the proposed changes,

the exceptions would become the rule. The Chief of the Forest Service would no longer have to personally approve departures from the sustained yield principle. In fact, individual forest supervisors would be *required* to consider departures from the principle in a broad range of circumstances—which virtually guarantees the liquidation of the forests.

- Require strict cost-benefit tests to be applied to non-commodity public uses of the forests but, ironically, allow timber production even from areas where the timber industry would never invest because production there is not economically sound. The effect will be to water down the protection of environmentally fragile areas from road construction and logging.
- Arbitrarily restrict consideration of especially scenic or ecologically valuable lands for wilderness designation.
- Eliminate portions of the regulations designed to encourage public participation in the forest planning process.
- Eliminate integrated pest management (IPM) as the principle for dealing with pests in National Forests. IPM involves minimal use of environmentally harmful chemical pesticides.
- Remove the requirement to maintain or improve habitat for valuable species such as trout or elk.

These changes come from the office of Assistant Secretary of Agriculture John B. Crowell. He was formerly general counsel of the Louisiana-Pacific timber firm, one of the largest timber cutters on federal lands. He was also chairman of a timber industry panel when the original regulations were developed. His chief deputy also comes from the timber industry. The proposed changes in regulations adopt almost exactly the positions the timber industry took as the regulations were being developed.

BLM Lands Management

The 328 million acres of public lands under the care of the Bureau of Land Management must be managed, under the law, for multiple use and long-term conservation. The Reagan Administration has tilted management of BLM lands toward resource development by private interests at the expense of resource conservation, and has cut the public out of the planning process.

Preamble

A century ago, federal policy was to give away the federally owned public lands and their resources to private interests. Gradually, the public and the Congress came to a consensus that the lands should be managed for a broad array of public interests, including both commercial resource development and non-commercial uses.

In 1976 Congress passed the Federal Land Policy and Management Act—the long awaited Bureau of

Lands Management Organic Act. It directed BLM, the nation's largest landowner, to manage its lands for multiple resource use and sustained yield, so as to protect their scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values. The law calls for prompt development of land use plans with public involvement.

Charges

Sacrificing Conservation for Resource Exploitation. Secretary of the Interior James Watt has poured money and staff into accelerated energy development on the public lands, while taking them away from renewable resource management and environmental protection. For the Bureau of Land Management, Watt has

- Sharply increased staff for onshore and offshore oil and gas leasing—40 new full-time positions in FY 1982 and 144 more proposed in FY 1983.
- Cut 130 full-time staff in FY 1982, with 195 further staff cuts scheduled in FY 1983, for resource inventories and environmental analyses in forest, range, recreation, wildlife habitat, and soil, water, and air management. This despite the increased need for analyzing the impacts of stepped-up oil and gas activities.
- Cut 28 positions for technical and environmental studies of coal development, while proposing the sale of 2.4 billion tons of federally owned coal in the Powder River Basin—five times larger than any sale in history—and seeking to speed up the leasing of publicly owned coal elsewhere.
- Cut the BLM planning budget by 48 percent. BLM planners are those who identify and try to reconcile conflicts among competing uses of the public lands. This cut could invite litigation, delay even well-conceived development, and impose extra costs on industry.

Historically, the staff and resources devoted to conservation on the public lands has closely matched the resources committed to resource development. The Reagan Administration is destroying the balance. The tilt is unprecedented and threatens serious long-term harm to the environmental quality and ecological health of the public lands.

Cutting the Public Out of BLM Planning. Claiming that many of the public participation rules under the Federal Land Policy and Management Act were “burdensome and unnecessary,” the BLM has not only cut the public out of the planning but has trivialized the plans themselves. In proposed amendments to the FLPMA regulations, BLM would

- Make proposed planning criteria available only on request, rather than publishing them for comment.
- No longer require that changes in criteria be made public.
- Select the land use plan on the basis of internal agency “guidance” (not subject to public review),

rather than the planning criteria.

- Allow BLM managers to take any action that does not "clearly contradict the land use plan," whereas previously such actions were to be "clearly consistent" with the plans.

The result of these changes would be to cut the connections between the criteria and the plans, between the plans and the real decisions, and between the public and the whole process. The last change would all but eliminate judicial review of planning decisions, since the difficulties of proving that an action "clearly contradicts" a land use plan would be insurmountable.

In short, decisions on the use of the public lands will be made behind closed doors by Interior Department officials unwilling to subject those decisions to the light of public review.

The Sagebrush Rebellion

The Reagan Administration is satisfying some of the demands of the "Sagebrush Rebels" by dropping conservation goals in managing western public lands. The Administration also proposes to reduce its huge budget deficits by selling off National Forest and other public lands. This one-time profit taking would deprive the nation forever of revenue-producing resources, would end multiple use management and conservation of important national lands, and would violate the intent of laws governing the public lands.

Preamble

The Federal Land Policy and Management Act of 1976 gave BLM real authority for the first time in its history. The next year the Surface Mining Act became law. Ranchers, miners, offroad vehicle users, and others who had been accustomed to doing as they pleased on the public lands discovered they could no longer do so. Led by livestock interests, they launched a political campaign that came to be known as the Sagebrush Rebellion. Its goal was to seize the federal public lands (including the National Forests) from public ownership, turn them over to the states, and move them into private ownership or private control.

Six western states, led by Nevada, laid claim to federal lands in court. None have won their cases. Some Western Congressmen introduced legislation to give the public lands to the states but because of popular opposition they received little serious attention.

Charges

Campaigning for President, Ronald Reagan said in Salt Lake City: "I am a Sagebrush Rebel." Once elected, he

- Appointed another self-professed Sagebrush Rebel Secretary of the Interior and another, Colorado rancher Robert Burford, to head the Bureau of Land Management.

Though court suits and legislation inspired by the Sagebrush Rebellion have failed, the Reagan Administration has satisfied some of its aims piecemeal. The Administration has

- Crippled BLM's land use planning (see BLM Lands Management).
- Changed grazing policy to put ranchers back in charge of the public range (see Grazing).
- Emasculated the Office of Surface Mining, upset regulations, and failed to enforce the law (see Coal Mining).
- Weakened regulations to control surface damage at mines and drilling sites.
- Ignored the BLM regulations governing use of offroad vehicles on the public lands. Secretary of the Interior Watt has tried—unsuccessfully so far—to get President Reagan to rescind the Nixon and Carter Executive Orders requiring control of ORV damage on the public lands.
- Invited the minerals industry to enter wilderness areas (see Wilderness).

The Administration now proposes to reduce its alarming budget deficit by selling off public lands—"privatize them," in the words of a White House economic advisor. The Administration plans to

- Sell \$17 billion worth of National Forest and BLM lands over five years. This could amount to 35 million acres. The sale would deprive the nation of valuable revenue-producing resources (timber, minerals, range) and put an end to multiple use and environmentally protective management of those lands.

Grazing

The public range has been seriously damaged by more than a century's overgrazing. The Reagan Administration's remedy is to spend federal money improving a part of the public range, and turn the improved portion over to private ranchers for their dominant use and control.

Preamble

Of the 328 million acres (including land in Alaska) managed by BLM, about 170 million acres are classified as "rangelands" for livestock grazing. Some 55 percent of this land is officially described as in "low or moderately low" condition. "Low" means that soil and vegetation meet 20 percent or less of the potential of the site. The federally owned rangelands have been abused primarily by overgrazing in the past; and overgrazing is still going on.

A major purpose of the land use plans required by the Federal Land Policy and Management Act is to protect and restore grazing lands—not only for the use of livestock, but also for the elk herds, mule deer, bighorn sheep, and pronghorn antelope that depend on the public lands for forage. Another important reason for restoring the Western grasslands is to control water and wind erosion, thus helping to reverse conditions that are threatening to create a new Dust Bowl.

Charges

Allowing Rangeland to Deteriorate and Ranchers to Dominate Rangeland Use. Rather than trying to heal the wounds caused by overgrazing, the Reagan Administration wants to reduce drastically federal regulation of livestock grazing on the public lands.

- Watt has cut 60 staff positions and \$3.8 million from grazing management activities in the FY 1983 budget.

Whatever funds are available for range improvement would go into land that is set aside mainly for production of red meat. Needs of wildlife and other non-commercial values would be all but ignored.

The new BLM grazing policy

- Divides rangeland into "custodial," "maintenance," and "improvement" categories, with funds targeted to the last category with the principal objective of yielding "maximum economic return." The policy appears to contradict FLPMA's multiple use mandate, which requires that consideration be given to the relative value of resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest economic output.
- Separates grazing decisions from overall land use planning. It demonstrates the effect (prematurely since the rules have not yet been finally changed) of dropping the requirement that management decisions shall be *consistent* with land use plans.

The Administration has made no effort to stop the gross subsidies of livestock grazing on the public lands. The public land grazing fee in 1982 will be \$1.86 per animal unit month (which is the grazing of one cow or five sheep in one month). Comparable private grazing lease rates are \$8.83. The artificially cheap price for grazing on the public lands invites the overgrazing which has badly damaged so much of the public land.

National Parks

For 110 years the National Park System has grown with the nation. It has offered the enjoyment of scenery, wildlife, and "natural wonders" to increasing numbers of Americans, while conserving those resources for future generations. The Reagan Administration has halted the park system's growth and is ignoring threats to the parks from air and water pollution and development on adjacent land. Its policies threaten the unique values that the park system is meant to preserve.

Preamble

The National Park System Organic Act of 1916 says the purpose of the parks is "to conserve the scenery and the natural and historic objects and the wildlife . . . and to provide for the enjoyment of the same in such manner . . . as will leave them unimpaired for the enjoyment of future generations." Today the system includes not only the great old parks like Yellowstone and Yosemite, but also national seashores and recreation areas, monuments, historic sites, sites for the performing arts, scenic rivers and trails, and open spaces in the nation's capital.

In 1980, about one American in four visited a National Park unit. Visits to parks are multiplying rapidly, reaching 300 million in 1980—ten times the number of visits in 1950 and 300 times the number in 1930.

For more than a century, Congress has continually added to the park system by designating suitable lands from the public domain and by buying privately held land. In 1965, Congress created the Land and Water Conservation Fund, which receives income mainly from offshore oil and gas leasing. Congress is authorized to appropriate up to \$900 million a year from the Fund to buy land for national parks, wildlife refuges and forests and to help states plan, purchase, and develop state parks. In that way, Congress provided that a modest share of the offshore oil and gas revenues (which totalled \$9.8 billion in 1981) will be used to conserve irreplaceable natural landscapes, historic places, and important recreation areas.

Charges

Stopping Growth of the Park System. The Reagan Administration opposes buying parkland already authorized by Congress, creating new parks, helping states buy and develop parks, and supporting urban parks in any way.

- Shortly after taking office, Secretary of the Interior James Watt imposed a complete moratorium on all federal land purchases from the Land and Water Conservation Fund. He also stopped all federal grants from the Fund to states. He stated publicly that he believes most "truly unique" park areas have already been acquired, and that the federal govern-

ment should not provide urban or regional parks. In other words, the Administration policy is that the park system need grow no further.

- In the FY 1982 budget request for the National Park Service, Secretary Watt asked for approximately \$39 million from the Land and Water Conservation Fund for acquisition of federal parkland. Those funds were to cover only court awards and administrative costs for purchases already in progress. That amount compares with an average appropriation of about \$550 million for each of the previous five years. Rejecting Watt's policy, Congress actually appropriated \$150 million in FY 1982 for federal parkland acquisition.
- Secretary Watt asked for no money for state grants in FY1982 and 1983. Congress appropriated none in FY1982, but made it clear the moratorium was for one year only.

The Reagan Administration's total cutoff of funds for parkland is a radical departure from policies over 100 years old. It violates the intent of Congress in creating the Land and Water Conservation Fund. The nation's growing population will have to share a fixed number of ever more heavily used National Parks. Critical lands needed to protect unique natural areas or to buffer existing parks against development will be lost or will have to be purchased later at much higher prices. There are now approximately 65 National Park units in 32 states for which land acquisition (presently valued at more than \$1 billion) has been authorized by Congress but not completed. Among the critical lands are the Appalachian Trail corridor, the Channel Islands off California, the Big Cypress Swamp in Florida, and the Santa Monica Mountain National Recreation Area near Los Angeles.

Ignoring Threats to the Parks. Secretary Watt's announced policy for the National Park System is to emphasize restoration, improvement, and maintenance of facilities in existing parks, rather than to continue to acquire land. He has asked Congress to amend the Land and Water Conservation Act to allow the Fund to be used for maintenance purposes. He has asked for \$105 million for restoration and maintenance of park facilities in FY 1983.

Maintaining park facilities to meet health and safety standards is important. However, Secretary Watt's priorities go in the wrong direction.

- The Watt proposal to dip into the Land and Water Conservation Fund for maintenance would rob it of money needed for buying additional parklands.
- The maintenance funds Secretary Watt is seeking for FY 1983 would go almost entirely to refurbishing roads, bridges, buildings, sewers, and park facilities, rather than for protection of the irreplaceable natural resources which are the park system's reason for existence. Indeed, emphasis on improvement of roads and park facilities may promote further heavy use of much-visited parks and add to the wear and tear on natural resources. The result could be first-rate plumbing and roads in a second-rate park system.

The most immediate and serious threat to the national parks is pollution from internal and external sources. In a 1980 report to the Congress, the National Park Service listed the threats which are causing severe degradation of park resources. Approximately 60 percent of the parks reported significant threats to scenic resources. Air and fresh-water quality, mammals and plants were reported threatened in about 40 percent of the parks. The Park Service staff has singled out specific threats to the natural resources of individual parks and has proposed research and protection measures. Yet Secretary Watt has asked for minimal funds to mitigate existing resource damage and to prevent new threats from developing.

In fact, the Administration has taken actions which increase pollution and other threats to the parks.

- The Administration has proposed amendments to the Clean Air Act that would eliminate protection of air quality and scenic vistas in national parks and wilderness areas. Air pollution, reduced visibility, and a closing in of vistas is already a major problem in national parks that are near large powerplants. For example, the Four Corners complex in New Mexico causes air pollution in Mesa Verde, Zion and Bryce Canyon National Parks; Everglades National Park in Florida is affected by a Florida Power and Light plant nearby.
- Secretary Watt tried to reverse a decision by former Secretary Cecil Andrus barring stripmining within 5 miles of Yovimpa Point, the most spectacular vista in Bryce Canyon National Park in Utah. Secretary Watt wanted to permit stripmining within view of the park. A federal district court in Utah refused to remand the case to Watt for review.
- Watt has reversed a Park Service decision to phase out motorized rafts operated by private concessioners in the Grand Canyon.
- Watt has supported proposals by snowmobile, off-road vehicle, and airboat organizations to open up certain national park and seashore areas to their uses. Watt has opened Lassen Volcanic National Park in California to snowmobile use; and the Park Service has decided to continue to allow snowmobile use in the Potholes region of Grand Teton National Park, despite a recommendation to the contrary by a blue ribbon panel.

Wilderness

Since the Wilderness Preservation System was created in 1964, it has been the policy of every Administration to protect wilderness from energy and minerals development. The Reagan Administration policy is to open the system to oil, gas, and mineral development, and close off major additions of new lands.

Preamble

Congress created the National Wilderness Preservation System in 1964 "to secure for the American people of present and future generations the benefits of an enduring resource of wilderness." In the terms of the Wilderness Act, "wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain."

The Wilderness System constitutes about 3 percent of the land base of the United States. It includes 23.4 million acres in the lower 48 states and 56.4 million acres in Alaska. All of the wilderness areas are within the federal public lands—in the National Forests, Parks, and Wildlife Refuges, and in the lands managed by the Bureau of Land Management (BLM).

From 1977 to 1979, the Forest Service reviewed 62 million acres of large roadless areas in the National Forests to determine what lands should be recommended to Congress for addition to the wilderness system and what lands should be made available for other uses. When that long study process was complete, the Carter Administration recommended that Congress designate a total of 15 million acres as wilderness. BLM is presently reviewing approximately 24 million acres to determine which lands under its jurisdiction should be recommended to Congress for wilderness designation.

The Wilderness Act allows prospecting and other activities in wilderness areas to collect information about mineral or other resources and requires the Department of the Interior to conduct periodic surveys to determine resource values. In addition, the Wilderness Act allows, but does not require, the Secretary of the Interior to issue energy and mineral leases in wilderness areas until December 31, 1983.

Recognizing that wilderness areas serve vital ecological functions, that they are the last remnants of America's primeval splendor, that they do not contain relatively large amounts of minerals or energy resources, and that they are irreplaceable, every Secretary of the Interior up to the present has, as a matter of policy, opposed mineral or energy development in designated wilderness areas.

Under the Wilderness Act, lands approved for inclusion in the wilderness system will be closed, except for valid existing claims and leases, to mineral and energy development after December 31, 1983.

Charges

Opening Wilderness to Development.

- In May 1981 Secretary Watt directed his Solicitor to find a way to "open wilderness areas." That directive repudiated the policy of every Secretary of the Interior since the Wilderness Act was passed in 1964.
- Secretary Watt advocated a 20-year delay, until 2003, of the date when wilderness lands will be closed to energy and minerals development. Secretary Watt misleadingly stated that delay of the deadline was necessary to inventory oil and gas and other mineral resources. In fact, the Wilderness Act allows, indeed requires, exploration and inventory without any time limit.
- The Forest Service issued draft recommendations to issue leases in the Washakie Wilderness adjacent to Yellowstone National Park, the Ventana Wilderness on California's Big Sur coast, and the Caney Creek Wilderness in Arkansas.
- The Forest Service considered a proposal for seismic exploration in its Bob Marshall Wilderness in Montana. In response, in May 1981, the House Interior Committee directed Secretary Watt to withdraw this area from minerals leasing.
- In November 1981 the Interior Department actually issued a lease for slant drilling into the National Forest's Capitan Wilderness in New Mexico. In recommending this lease, the Forest Service failed to comply with the requirements of law for public notice, public comment, or environmental impact studies.

Expressing alarm at Secretary Watt's actions and advocacy to open up wilderness, the House Interior Committee voted in November 1981 for a six-month moratorium on leasing in wilderness areas.

Faced with firm Congressional opposition, the Administration tried different tactics. In January 1982, Secretary Watt extended the Congressional moratorium on leasing in wilderness until after the current session of Congress and the 1982 elections. Then, in February 1982 Secretary Watt announced a new program, billed as "protection" of wilderness, which actually pursues the same policy of opening wilderness, but under a new guise. He presented the Administration's proposed Wilderness Protection Act of 1982, which would

- Allow the President, without Congressional approval, to open any wilderness area by declaring an undefined "urgent national need." Under the present law, lands designated by Congress as wilderness remain closed to development after December 31, 1983 forever, unless Congress determines otherwise.
- Automatically end protection for the entire wilderness system, opening all wilderness areas to mineral and energy development in the year 2000.

Shutting Off Additions to the Wilderness System.

The Administration wants not only to open the whole wilderness system to energy and mineral development in 2000 but to make sure that, in the meantime, little if any new land is added to the system. The Administration's bill would

- Set short, rigid deadlines for Congress to act on Forest Service and BLM lands recommended for wilderness designation, or recommended for study for designation.
- Give no second chances. Lands not actually designated as wilderness by the deadlines would be permanently released for development. The Forest Service would be barred from ever again studying its lands for wilderness or managing those lands as wilderness, without Congressional approval. Under existing law, wilderness values must be considered in the ongoing, periodic forest planning process.
- Take away from Congress and give to the President the power to determine which BLM wilderness study areas should be released to development. All BLM wilderness study areas would be subject to immediate development.

In addition to its anti-wilderness legislation, the Reagan Administration has, by executive action, attempted to block or limit additions to the Wilderness System.

- Assistant Secretary of Agriculture John Crowell eliminated almost 1 million acres from the previous administration's recommendation to Congress for addition of Forest Service land to the wilderness system.
- Assistant Secretary Crowell has testified against designation of lands recommended for wilderness in the Cranberry area of the Monongahela National Forest, West Virginia; the Big Gump Swamp in the Osceola National Forest, Florida; and Cougar Lakes in the Wenatchee National Forest, Washington.

Fish and Wildlife

In the Reagan Administration, protection of fish and wildlife takes second place to resource development. Secretary Watt has weakened protection of endangered species, downgraded wildlife protection in his crash energy program, sacrificed wildlife for grazing interests, and refused to acquire wildlife habitat authorized by Congress.

Preamble

The federal government is steward of much of the nation's wildlife. Federal wildlife refuges cover over 89 million acres of our public lands. In addition, half a billion acres of publicly owned lands (in National Forests and public lands managed by BLM) are required by law to be managed for multiple uses, one of which is conservation of fish and wildlife.

In addition, several federal laws protect wildlife habitat in state, local, or private ownership against destruction brought about by federal government activities such as dam building and construction of sewers and water treatment plants.

Charges

The Reagan Administration does not have an explicit program for weakening protection of wildlife. Indeed, Secretary of the Interior James Watt lays claim to good stewardship of the nation's wildlife refuges and habitat. The claims are misleading. In fact, under the present Administration, when wildlife and resource development are in conflict, wildlife loses. With few exceptions, whatever gains have been made in wildlife protection during the Reagan Administration were forced on it by Congress, or were a legacy from the past.

Weakening Protection of Endangered Species. The Reagan Administration has

- Paralyzed listing of endangered species. In 14 months the Administration listed only one of the more than two dozen species which had been proposed for listing when President Reagan took office. Listing of that one species (the Hays Spring Amphipod, a tiny invertebrate) has no economic effect whatever, since its only habitat is the Washington Zoo.
- Refused, until threatened with a lawsuit, to list four species that had been finalized by President Carter.
- Bottled up 70 additional listings.
- Proposed cutting 34 percent (\$7.9 million) in FY 1982 from the endangered species program, which was already charged with more responsibilities than it could handle on a limited budget. Congress allowed a cut of 24 percent. Secretary Watt has proposed a further cut of \$1.2 million for FY 1983.
- Proposed cutting the program for recovery of endangered species in FY 1982. Congress blocked that proposal. The Administration is now claiming credit for completing recovery plans.
- Proposed to reduce endangered species law enforcement staff by 15 positions out of 203, despite increased killing of bald eagles and a large trade in protected species.
- Eliminated \$3.9 million in federal funding for state programs to conserve endangered species habitat.

Sacrificing Wildlife Protection for Energy and Grazing Interests. The Reagan Administration has

- Accelerated plans for oil and gas exploration in wildlife refuges in Alaska while proposing a 50 percent cut (from \$8 million to less than \$4 million) in the Alaska Refuge Management Budget for FY 1982.
- Withdrawn final regulations under the Fish and Wildlife Coordination Act that would have elevated the importance of wildlife habitat values in considering federal permits and federally funded projects.

- Systematically cut funding for vegetation inventories, habitat evaluation, instream flow studies, environmental analyses, and other programs to determine the carrying capacity of public lands to support fish and wildlife and to determine the compatibility between energy development and fish and wildlife protection. At the same time, the Administration has added funds for energy development—thereby increasing the need for the studies being cut.
- Put all of BLM's resources for improvement of the public range into areas where ranchers will get first call for red meat production, leaving little for wildlife.

President Reagan personally

- Rescinded a ten-year-old Executive Order issued by President Nixon that banned the use on the public lands of 1080, a highly toxic poison used to kill coyotes and other predators.

EPA had cancelled registration of 1080 as a pesticide and severely limited its use as a rodenticide ten years ago because it poisons nontarget species such as raccoons, badgers, and eagles as well as coyotes. Under the Reagan Administration

- EPA has begun proceedings to re-examine the 1080 ban. EPA Administrator Gorsuch stated that "new information" justified re-opening the issue. A University of California scientist, whose work was cited as the major source of the "new information" has charged that EPA and Gorsuch distorted his findings. "EPA needed some pivotal scientific basis to justify and trigger these hearings," said a spokesman for the University, "so they... misrepresented [the scientist's] statements to justify the hearings."
- The Fish and Wildlife Service applied to EPA to approve 1080 for some uses as a predator poison.

Blocking Acquisition of Refuges. Watt claims credit for acquisition of land for several federal and state refuges, all of which he opposed until he was overruled by Congress. Specifically, the Administration has

- Proposed zero funding from the Land and Water Conservation Fund for wildlife refuge acquisition in FY 1982 and only \$1.6 million in FY 1983 for partial acquisition of endangered species habitat. At least \$54 million is needed from the Fund for buying priority areas, already authorized by Congress for acquisition, to protect them from development and habitat destruction. The two new refuges for which purchase has begun (Bogue Chitto, Louisiana, and Bon Secour, Alabama) were ordered by Congress over Watt's objections.
- Opposed acquisition of privately owned enclaves in refuges in New Jersey, California, and Maine. Congress overruled him.
- Eliminated grants from the Land and Water Conservation Fund for state habitat acquisition.
- Proposed zero funding for wetlands acquisition under the Wetlands Loan Act in FY 1983.

In 1977 the Fish and Wildlife Service identified 1,947,000 acres of wetlands in need of protection under its 10-year duck stamp program.

- The Fish and Wildlife Service purchased only 24,349 acres of wetland—paid for by duck stamps—in the first year of the Reagan Administration. At the Reagan rate of acquisition, it would take 78 years to complete the program. Meanwhile, the nation is losing 600,000 acres of wetland to development every year.
- Watt proposed no new funding for wetlands acquisition under the Wetlands Loan Act in FY 1983. Authority to acquire wetlands under this program expires at the end of FY 1983.

The Administration has announced that it actually intends to divest the National Wildlife Refuge System of a key refuge area. It proposes to

- Transfer National Wildlife Refuge Lands on Matagorda Island to Texas, which wants to use the land for recreation. That use is incompatible with the conservation objectives and special qualities of Matagorda, which provides critical habitat for the highly endangered whooping crane and habitat for several other endangered species.

Cutting Cooperation with States. The Reagan Administration wants to eliminate all federal funding for the Cooperative Wildlife and Fisheries Units. In this program, the Fish and Wildlife Service cooperates with land grant universities and state wildlife agencies in wildlife and fishery research and training. The program trains four out of five of the country's wildlife biologists. Federal funds pay for about one-third of the costs. The Reagan Administration has

- Proposed to cut funding to zero, in both FY 1982 and FY 1983, for the Cooperative Units. Congress restored \$4.4 million for the program in FY 1982.

One positive accomplishment of this Administration is the speedup of the ecological mapping inventory of fish and wildlife resources of the Pacific Coast and a start on mapping of the Gulf Coast.

This solitary accomplishment must be judged against the record, outlined above, of relegating fish and wildlife protection to secondary importance.

Charges

The Reagan Administration is offering the timber industry a \$150 million-a-year subsidy for a timber sale that is too big, makes no sense economically, and threatens serious harm to the environment. The Administration's policy is to impose commercial resource extraction as the dominant use of the National Forests. It wants to undo years of professional planning for wise, balanced management of our National Forests—planning based on wide public participation and under standards prescribed by law. Moreover, President Reagan has put in charge of the nation's publicly owned forests a former timber industry executive and outspoken advocate of the industry's interests.

Subsidizing the Timber Industry. Despite a current low demand for timber and an all-time high backlog of sold but uncut timber in the National Forests, the Reagan Administration proposes to increase timber sales dramatically.

- The Reagan budget requests a timber sale from the National Forests of 12.3 billion board feet for FY 1983. That is 4 billion board feet higher than the amount cut last year. The excessive FY 1983 sale is planned despite the depressed housing industry and a record high backlog of approximately 34 billion board feet. The backlog amounts to more than three years' worth of average timber sales from the National Forests.
- The proposed timber sale conceals at least a \$150 million subsidy. The sale will cost the U.S. Treasury \$665 million (mostly for road construction). The Forest Service has in the past acknowledged that 22 percent of its timber sales are below cost. If these subsidized sales were eliminated, the sale could be reduced to a more realistic 9.6 billion board feet. Savings to the taxpayers would be \$150 million.
- The proposed sale is environmentally unsound. The budget for the sale shows \$585 million for road building, \$200 million more than in 1982. As the Reagan budget itself explains, the sharply higher cost is for roads in "difficult terrain" with "access problems." Forest Service research shows road construction is the prime cause of soil erosion, silting of streams, and damage to trout fisheries in the National Forests. Those problems are doubly acute in "difficult terrain."
- Some of the sales would be made in virgin areas of the National Forests that have never before had roads. Opening roads into them would remove them forever from possible designation as wilderness.

Federal sales below cost do not necessarily increase national supplies. In fact, they can unfairly compete with production for profit on private lands and discourage investments there.

Making Resource Extraction the Dominant Use. The wasteful expenditures for roads and subsidized timber sales robs the Forest Service of funds needed for other multiple use responsibilities. The Administration's FY 1983 budget request for the Forest Ser-

vice slashes funds for recreation, fish and wildlife, and watershed protection, while sharply increasing support for timber and mineral activities.

The Forest Service's 1980 long-term program was drawn up by professionals under the Resources Planning Act and was adopted by Congress, with some revision, in 1980. This current, Congressionally approved RPA Program gives balanced consideration to all the resources of the National Forests. The Reagan FY 1983 budget proposal skews the Forest Service's program planning out of all proportion. It meets or exceeds the goals for timber sales, mineral development, and livestock grazing, but cuts fish and wildlife management goals by 64 percent, trail construction by 90 percent, and soil and water protection by 99 percent.

Further examples are:

- The Reagan FY 1983 budget would cut trail maintenance by 30 percent from 1982 levels. Already, in the 1982 budget, maintenance was abandoned for 10,000 miles of the 100,000-mile trail system in National Forests. The further cut would mean that another 30,000 miles would be allowed to deteriorate.
- No allowance is made in the FY 1983 Reagan budget for wildlife habitat protection, except in timber sale areas.

The Osceola National Forest in Florida is a victim of the Reagan Administration's policy to sacrifice multiple uses of the public forests to resource extraction.

- After almost 10 years of opposing the issuance of leases for open pit mining of phosphate in the Osceola National Forest because of severe adverse impacts on wildlife, recreation, and air and water resources, the Department of the Interior and EPA have recently reversed their position. The Interior Department, which has the authority to issue those leases under the Mineral Leasing Act of 1920, is apparently disregarding existing regulations, as well as a 1981 solicitor's opinion, in processing the pending lease applications.

Frustrating the Reforms Imposed by Law. Changes proposed by the Reagan Administration in forest planning regulations are of dubious legality and will frustrate the reforms Congress called for in the National Forest Management Act. Regulations under the Act had been adopted in final form in 1979, after three laborious years of drafting, public comments, redrafting, and reaching a workable compromise among the many interests using the National Forests. Discarding that carefully crafted compromise, the Reagan Administration would

- Abandon sustained yield management to allow rapid increases in cutting the old, pristine forests in the Pacific Northwest. The law requires that departures from sustained yield management must be carefully controlled exceptions. Under the proposed changes,

the exceptions would become the rule. The Chief of the Forest Service would no longer have to personally approve departures from the sustained yield principle. In fact, individual forest supervisors would be *required* to consider departures from the principle in a broad range of circumstances—which virtually guarantees the liquidation of the forests.

- Require strict cost-benefit tests to be applied to non-commodity public uses of the forests but, ironically, allow timber production even from areas where the timber industry would never invest because production there is not economically sound. The effect will be to water down the protection of environmentally fragile areas from road construction and logging.
- Arbitrarily restrict consideration of especially scenic or ecologically valuable lands for wilderness designation.
- Eliminate portions of the regulations designed to encourage public participation in the forest planning process.
- Eliminate integrated pest management (IPM) as the principle for dealing with pests in National Forests. IPM involves minimal use of environmentally harmful chemical pesticides.
- Remove the requirement to maintain or improve habitat for valuable species such as trout or elk.

These changes come from the office of Assistant Secretary of Agriculture John B. Crowell. He was formerly general counsel of the Louisiana-Pacific timber firm, one of the largest timber cutters on federal lands. He was also chairman of a timber industry panel when the original regulations were developed. His chief deputy also comes from the timber industry. The proposed changes in regulations adopt almost exactly the positions the timber industry took as the regulations were being developed.

BLM Lands Management

The 328 million acres of public lands under the care of the Bureau of Land Management must be managed, under the law, for multiple use and long-term conservation. The Reagan Administration has tilted management of BLM lands toward resource development by private interests at the expense of resource conservation, and has cut the public out of the planning process.

Preamble

A century ago, federal policy was to give away the federally owned public lands and their resources to private interests. Gradually, the public and the Congress came to a consensus that the lands should be managed for a broad array of public interests, including both commercial resource development and non-commercial uses.

In 1976 Congress passed the Federal Land Policy and Management Act—the long awaited Bureau of

Lands Management Organic Act. It directed BLM, the nation's largest landowner, to manage its lands for multiple resource use and sustained yield, so as to protect their scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values. The law calls for prompt development of land use plans with public involvement.

Charges

Sacrificing Conservation for Resource Exploitation. Secretary of the Interior James Watt has poured money and staff into accelerated energy development on the public lands, while taking them away from renewable resource management and environmental protection. For the Bureau of Land Management, Watt has

- Sharply increased staff for onshore and offshore oil and gas leasing—40 new full-time positions in FY 1982 and 144 more proposed in FY 1983.
- Cut 130 full-time staff in FY 1982, with 195 further staff cuts scheduled in FY 1983, for resource inventories and environmental analyses in forest, range, recreation, wildlife habitat, and soil, water, and air management. This despite the increased need for analyzing the impacts of stepped-up oil and gas activities.
- Cut 28 positions for technical and environmental studies of coal development, while proposing the sale of 2.4 billion tons of federally owned coal in the Powder River Basin—five times larger than any sale in history—and seeking to speed up the leasing of publicly owned coal elsewhere.
- Cut the BLM planning budget by 48 percent. BLM planners are those who identify and try to reconcile conflicts among competing uses of the public lands. This cut could invite litigation, delay even well-conceived development, and impose extra costs on industry.

Historically, the staff and resources devoted to conservation on the public lands has closely matched the resources committed to resource development. The Reagan Administration is destroying the balance. The tilt is unprecedented and threatens serious long-term harm to the environmental quality and ecological health of the public lands.

Cutting the Public Out of BLM Planning. Claiming that many of the public participation rules under the Federal Land Policy and Management Act were “burdensome and unnecessary,” the BLM has not only cut the public out of the planning but has trivialized the plans themselves. In proposed amendments to the FLPMA regulations, BLM would

- Make proposed planning criteria available only on request, rather than publishing them for comment.
- No longer require that changes in criteria be made public.
- Select the land use plan on the basis of internal agency “guidance” (not subject to public review),

rather than the planning criteria.

- Allow BLM managers to take any action that does not "clearly contradict the land use plan," whereas previously such actions were to be "clearly consistent" with the plans.

The result of these changes would be to cut the connections between the criteria and the plans, between the plans and the real decisions, and between the public and the whole process. The last change would all but eliminate judicial review of planning decisions, since the difficulties of proving that an action "clearly contradicts" a land use plan would be insurmountable.

In short, decisions on the use of the public lands will be made behind closed doors by Interior Department officials unwilling to subject those decisions to the light of public review.

The Sagebrush Rebellion

The Reagan Administration is satisfying some of the demands of the "Sagebrush Rebels" by dropping conservation goals in managing western public lands. The Administration also proposes to reduce its huge budget deficits by selling off National Forest and other public lands. This one-time profit taking would deprive the nation forever of revenue-producing resources, would end multiple use management and conservation of important national lands, and would violate the intent of laws governing the public lands.

Preamble

The Federal Land Policy and Management Act of 1976 gave BLM real authority for the first time in its history. The next year the Surface Mining Act became law. Ranchers, miners, offroad vehicle users, and others who had been accustomed to doing as they pleased on the public lands discovered they could no longer do so. Led by livestock interests, they launched a political campaign that came to be known as the Sagebrush Rebellion. Its goal was to seize the federal public lands (including the National Forests) from public ownership, turn them over to the states, and move them into private ownership or private control.

Six western states, led by Nevada, laid claim to federal lands in court. None have won their cases. Some Western Congressmen introduced legislation to give the public lands to the states but because of popular opposition they received little serious attention.

Charges

Campaigning for President, Ronald Reagan said in Salt Lake City: "I am a Sagebrush Rebel." Once elected, he

- Appointed another self-professed Sagebrush Rebel Secretary of the Interior and another, Colorado rancher Robert Burford, to head the Bureau of Land Management.

Though court suits and legislation inspired by the Sagebrush Rebellion have failed, the Reagan Administration has satisfied some of its aims piecemeal. The Administration has

- Crippled BLM's land use planning (see BLM Lands Management).
- Changed grazing policy to put ranchers back in charge of the public range (see Grazing).
- Emasculated the Office of Surface Mining, upset regulations, and failed to enforce the law (see Coal Mining).
- Weakened regulations to control surface damage at mines and drilling sites.
- Ignored the BLM regulations governing use of offroad vehicles on the public lands. Secretary of the Interior Watt has tried—unsuccessfully so far—to get President Reagan to rescind the Nixon and Carter Executive Orders requiring control of ORV damage on the public lands.
- Invited the minerals industry to enter wilderness areas (see Wilderness).

The Administration now proposes to reduce its alarming budget deficit by selling off public lands—"privatize them," in the words of a White House economic advisor. The Administration plans to

- Sell \$17 billion worth of National Forest and BLM lands over five years. This could amount to 35 million acres. The sale would deprive the nation of valuable revenue-producing resources (timber, minerals, range) and put an end to multiple use and environmentally protective management of those lands.

Grazing

The public range has been seriously damaged by more than a century's overgrazing. The Reagan Administration's remedy is to spend federal money improving a part of the public range, and turn the improved portion over to private ranchers for their dominant use and control.

Preamble

Of the 328 million acres (including land in Alaska) managed by BLM, about 170 million acres are classified as "rangelands" for livestock grazing. Some 55 percent of this land is officially described as in "low or moderately low" condition. "Low" means that soil and vegetation meet 20 percent or less of the potential of the site. The federally owned rangelands have been abused primarily by overgrazing in the past; and overgrazing is still going on.

A major purpose of the land use plans required by the Federal Land Policy and Management Act is to protect and restore grazing lands—not only for the use of livestock, but also for the elk herds, mule deer, bighorn sheep, and pronghorn antelope that depend on the public lands for forage. Another important reason for restoring the Western grasslands is to control water and wind erosion, thus helping to reverse conditions that are threatening to create a new Dust Bowl.

Charges

Allowing Rangeland to Deteriorate and Ranchers to Dominate Rangeland Use. Rather than trying to heal the wounds caused by overgrazing, the Reagan Administration wants to reduce drastically federal regulation of livestock grazing on the public lands.

- Watt has cut 60 staff positions and \$3.8 million from grazing management activities in the FY 1983 budget.

Whatever funds are available for range improvement would go into land that is set aside mainly for production of red meat. Needs of wildlife and other non-commercial values would be all but ignored.

The new BLM grazing policy

- Divides rangeland into "custodial," "maintenance," and "improvement" categories, with funds targeted to the last category with the principal objective of yielding "maximum economic return." The policy appears to contradict FLPMA's multiple use mandate, which requires that consideration be given to the relative value of resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest economic output.
- Separates grazing decisions from overall land use planning. It demonstrates the effect (prematurely since the rules have not yet been finally changed) of dropping the requirement that management decisions shall be *consistent* with land use plans.

The Administration has made no effort to stop the gross subsidies of livestock grazing on the public lands. The public land grazing fee in 1982 will be \$1.86 per animal unit month (which is the grazing of one cow or five sheep in one month). Comparable private grazing lease rates are \$8.83. The artificially cheap price for grazing on the public lands invites the overgrazing which has badly damaged so much of the public land.

National Parks

For 110 years the National Park System has grown with the nation. It has offered the enjoyment of scenery, wildlife, and "natural wonders" to increasing numbers of Americans, while conserving those resources for future generations. The Reagan Administration has halted the park system's growth and is ignoring threats to the parks from air and water pollution and development on adjacent land. Its policies threaten the unique values that the park system is meant to preserve.

Preamble

The National Park System Organic Act of 1916 says the purpose of the parks is "to conserve the scenery and the natural and historic objects and the wildlife . . . and to provide for the enjoyment of the same in such manner . . . as will leave them unimpaired for the enjoyment of future generations." Today the system includes not only the great old parks like Yellowstone and Yosemite, but also national seashores and recreation areas, monuments, historic sites, sites for the performing arts, scenic rivers and trails, and open spaces in the nation's capital.

In 1980, about one American in four visited a National Park unit. Visits to parks are multiplying rapidly, reaching 300 million in 1980—ten times the number of visits in 1950 and 300 times the number in 1930.

For more than a century, Congress has continually added to the park system by designating suitable lands from the public domain and by buying privately held land. In 1965, Congress created the Land and Water Conservation Fund, which receives income mainly from offshore oil and gas leasing. Congress is authorized to appropriate up to \$900 million a year from the Fund to buy land for national parks, wildlife refuges and forests and to help states plan, purchase, and develop state parks. In that way, Congress provided that a modest share of the offshore oil and gas revenues (which totalled \$9.8 billion in 1981) will be used to conserve irreplaceable natural landscapes, historic places, and important recreation areas.

Charges

Stopping Growth of the Park System. The Reagan Administration opposes buying parkland already authorized by Congress, creating new parks, helping states buy and develop parks, and supporting urban parks in any way.

- Shortly after taking office, Secretary of the Interior James Watt imposed a complete moratorium on all federal land purchases from the Land and Water Conservation Fund. He also stopped all federal grants from the Fund to states. He stated publicly that he believes most "truly unique" park areas have already been acquired, and that the federal govern-

ment should not provide urban or regional parks. In other words, the Administration policy is that the park system need grow no further.

- In the FY 1982 budget request for the National Park Service, Secretary Watt asked for approximately \$39 million from the Land and Water Conservation Fund for acquisition of federal parkland. Those funds were to cover only court awards and administrative costs for purchases already in progress. That amount compares with an average appropriation of about \$550 million for each of the previous five years. Rejecting Watt's policy, Congress actually appropriated \$150 million in FY 1982 for federal parkland acquisition.
- Secretary Watt asked for no money for state grants in FY1982 and 1983. Congress appropriated none in FY1982, but made it clear the moratorium was for one year only.

The Reagan Administration's total cutoff of funds for parkland is a radical departure from policies over 100 years old. It violates the intent of Congress in creating the Land and Water Conservation Fund. The nation's growing population will have to share a fixed number of ever more heavily used National Parks. Critical lands needed to protect unique natural areas or to buffer existing parks against development will be lost or will have to be purchased later at much higher prices. There are now approximately 65 National Park units in 32 states for which land acquisition (presently valued at more than \$1 billion) has been authorized by Congress but not completed. Among the critical lands are the Appalachian Trail corridor, the Channel Islands off California, the Big Cypress Swamp in Florida, and the Santa Monica Mountain National Recreation Area near Los Angeles.

Ignoring Threats to the Parks. Secretary Watt's announced policy for the National Park System is to emphasize restoration, improvement, and maintenance of facilities in existing parks, rather than to continue to acquire land. He has asked Congress to amend the Land and Water Conservation Act to allow the Fund to be used for maintenance purposes. He has asked for \$105 million for restoration and maintenance of park facilities in FY 1983.

Maintaining park facilities to meet health and safety standards is important. However, Secretary Watt's priorities go in the wrong direction.

- The Watt proposal to dip into the Land and Water Conservation Fund for maintenance would rob it of money needed for buying additional parklands.
- The maintenance funds Secretary Watt is seeking for FY 1983 would go almost entirely to refurbishing roads, bridges, buildings, sewers, and park facilities, rather than for protection of the irreplaceable natural resources which are the park system's reason for existence. Indeed, emphasis on improvement of roads and park facilities may promote further heavy use of much-visited parks and add to the wear and tear on natural resources. The result could be first-rate plumbing and roads in a second-rate park system.

The most immediate and serious threat to the national parks is pollution from internal and external sources. In a 1980 report to the Congress, the National Park Service listed the threats which are causing severe degradation of park resources. Approximately 60 percent of the parks reported significant threats to scenic resources. Air and fresh-water quality, mammals and plants were reported threatened in about 40 percent of the parks. The Park Service staff has singled out specific threats to the natural resources of individual parks and has proposed research and protection measures. Yet Secretary Watt has asked for minimal funds to mitigate existing resource damage and to prevent new threats from developing.

In fact, the Administration has taken actions which increase pollution and other threats to the parks.

- The Administration has proposed amendments to the Clean Air Act that would eliminate protection of air quality and scenic vistas in national parks and wilderness areas. Air pollution, reduced visibility, and a closing in of vistas is already a major problem in national parks that are near large powerplants. For example, the Four Corners complex in New Mexico causes air pollution in Mesa Verde, Zion and Bryce Canyon National Parks; Everglades National Park in Florida is affected by a Florida Power and Light plant nearby.
- Secretary Watt tried to reverse a decision by former Secretary Cecil Andrus barring stripmining within 5 miles of Yovimpa Point, the most spectacular vista in Bryce Canyon National Park in Utah. Secretary Watt wanted to permit stripmining within view of the park. A federal district court in Utah refused to remand the case to Watt for review.
- Watt has reversed a Park Service decision to phase out motorized rafts operated by private concessioners in the Grand Canyon.
- Watt has supported proposals by snowmobile, off-road vehicle, and airboat organizations to open up certain national park and seashore areas to their uses. Watt has opened Lassen Volcanic National Park in California to snowmobile use; and the Park Service has decided to continue to allow snowmobile use in the Potholes region of Grand Teton National Park, despite a recommendation to the contrary by a blue ribbon panel.

Wilderness

Since the Wilderness Preservation System was created in 1964, it has been the policy of every Administration to protect wilderness from energy and minerals development. The Reagan Administration policy is to open the system to oil, gas, and mineral development, and close off major additions of new lands.

Preamble

Congress created the National Wilderness Preservation System in 1964 "to secure for the American people of present and future generations the benefits of an enduring resource of wilderness." In the terms of the Wilderness Act, "wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain."

The Wilderness System constitutes about 3 percent of the land base of the United States. It includes 23.4 million acres in the lower 48 states and 56.4 million acres in Alaska. All of the wilderness areas are within the federal public lands—in the National Forests, Parks, and Wildlife Refuges, and in the lands managed by the Bureau of Land Management (BLM).

From 1977 to 1979, the Forest Service reviewed 62 million acres of large roadless areas in the National Forests to determine what lands should be recommended to Congress for addition to the wilderness system and what lands should be made available for other uses. When that long study process was complete, the Carter Administration recommended that Congress designate a total of 15 million acres as wilderness. BLM is presently reviewing approximately 24 million acres to determine which lands under its jurisdiction should be recommended to Congress for wilderness designation.

The Wilderness Act allows prospecting and other activities in wilderness areas to collect information about mineral or other resources and requires the Department of the Interior to conduct periodic surveys to determine resource values. In addition, the Wilderness Act allows, but does not require, the Secretary of the Interior to issue energy and mineral leases in wilderness areas until December 31, 1983.

Recognizing that wilderness areas serve vital ecological functions, that they are the last remnants of America's primeval splendor, that they do not contain relatively large amounts of minerals or energy resources, and that they are irreplaceable, every Secretary of the Interior up to the present has, as a matter of policy, opposed mineral or energy development in designated wilderness areas.

Under the Wilderness Act, lands approved for inclusion in the wilderness system will be closed, except for valid existing claims and leases, to mineral and energy development after December 31, 1983.

Charges

Opening Wilderness to Development.

- In May 1981 Secretary Watt directed his Solicitor to find a way to "open wilderness areas." That directive repudiated the policy of every Secretary of the Interior since the Wilderness Act was passed in 1964.
- Secretary Watt advocated a 20-year delay, until 2003, of the date when wilderness lands will be closed to energy and minerals development. Secretary Watt misleadingly stated that delay of the deadline was necessary to inventory oil and gas and other mineral resources. In fact, the Wilderness Act allows, indeed requires, exploration and inventory without any time limit.
- The Forest Service issued draft recommendations to issue leases in the Washakie Wilderness adjacent to Yellowstone National Park, the Ventana Wilderness on California's Big Sur coast, and the Caney Creek Wilderness in Arkansas.
- The Forest Service considered a proposal for seismic exploration in its Bob Marshall Wilderness in Montana. In response, in May 1981, the House Interior Committee directed Secretary Watt to withdraw this area from minerals leasing.
- In November 1981 the Interior Department actually issued a lease for slant drilling into the National Forest's Capitan Wilderness in New Mexico. In recommending this lease, the Forest Service failed to comply with the requirements of law for public notice, public comment, or environmental impact studies.

Expressing alarm at Secretary Watt's actions and advocacy to open up wilderness, the House Interior Committee voted in November 1981 for a six-month moratorium on leasing in wilderness areas.

Faced with firm Congressional opposition, the Administration tried different tactics. In January 1982, Secretary Watt extended the Congressional moratorium on leasing in wilderness until after the current session of Congress and the 1982 elections. Then, in February 1982 Secretary Watt announced a new program, billed as "protection" of wilderness, which actually pursues the same policy of opening wilderness, but under a new guise. He presented the Administration's proposed Wilderness Protection Act of 1982, which would

- Allow the President, without Congressional approval, to open any wilderness area by declaring an undefined "urgent national need." Under the present law, lands designated by Congress as wilderness remain closed to development after December 31, 1983 forever, unless Congress determines otherwise.
- Automatically end protection for the entire wilderness system, opening all wilderness areas to mineral and energy development in the year 2000.

Shutting Off Additions to the Wilderness System.

The Administration wants not only to open the whole wilderness system to energy and mineral development in 2000 but to make sure that, in the meantime, little if any new land is added to the system. The Administration's bill would

- Set short, rigid deadlines for Congress to act on Forest Service and BLM lands recommended for wilderness designation, or recommended for study for designation.
- Give no second chances. Lands not actually designated as wilderness by the deadlines would be permanently released for development. The Forest Service would be barred from ever again studying its lands for wilderness or managing those lands as wilderness, without Congressional approval. Under existing law, wilderness values must be considered in the ongoing, periodic forest planning process.
- Take away from Congress and give to the President the power to determine which BLM wilderness study areas should be released to development. All BLM wilderness study areas would be subject to immediate development.

In addition to its anti-wilderness legislation, the Reagan Administration has, by executive action, attempted to block or limit additions to the Wilderness System.

- Assistant Secretary of Agriculture John Crowell eliminated almost 1 million acres from the previous administration's recommendation to Congress for addition of Forest Service land to the wilderness system.
- Assistant Secretary Crowell has testified against designation of lands recommended for wilderness in the Cranberry area of the Monongahela National Forest, West Virginia; the Big Gump Swamp in the Osceola National Forest, Florida; and Cougar Lakes in the Wenatchee National Forest, Washington.

Fish and Wildlife

In the Reagan Administration, protection of fish and wildlife takes second place to resource development. Secretary Watt has weakened protection of endangered species, downgraded wildlife protection in his crash energy program, sacrificed wildlife for grazing interests, and refused to acquire wildlife habitat authorized by Congress.

Preamble

The federal government is steward of much of the nation's wildlife. Federal wildlife refuges cover over 89 million acres of our public lands. In addition, half a billion acres of publicly owned lands (in National Forests and public lands managed by BLM) are required by law to be managed for multiple uses, one of which is conservation of fish and wildlife.

In addition, several federal laws protect wildlife habitat in state, local, or private ownership against destruction brought about by federal government activities such as dam building and construction of sewers and water treatment plants.

Charges

The Reagan Administration does not have an explicit program for weakening protection of wildlife. Indeed, Secretary of the Interior James Watt lays claim to good stewardship of the nation's wildlife refuges and habitat. The claims are misleading. In fact, under the present Administration, when wildlife and resource development are in conflict, wildlife loses. With few exceptions, whatever gains have been made in wildlife protection during the Reagan Administration were forced on it by Congress, or were a legacy from the past.

Weakening Protection of Endangered Species. The Reagan Administration has

- Paralyzed listing of endangered species. In 14 months the Administration listed only one of the more than two dozen species which had been proposed for listing when President Reagan took office. Listing of that one species (the Hays Spring Amphipod, a tiny invertebrate) has no economic effect whatever, since its only habitat is the Washington Zoo.
- Refused, until threatened with a lawsuit, to list four species that had been finalized by President Carter.
- Bottled up 70 additional listings.
- Proposed cutting 34 percent (\$7.9 million) in FY 1982 from the endangered species program, which was already charged with more responsibilities than it could handle on a limited budget. Congress allowed a cut of 24 percent. Secretary Watt has proposed a further cut of \$1.2 million for FY 1983.
- Proposed cutting the program for recovery of endangered species in FY 1982. Congress blocked that proposal. The Administration is now claiming credit for completing recovery plans.
- Proposed to reduce endangered species law enforcement staff by 15 positions out of 203, despite increased killing of bald eagles and a large trade in protected species.
- Eliminated \$3.9 million in federal funding for state programs to conserve endangered species habitat.

Sacrificing Wildlife Protection for Energy and Grazing Interests. The Reagan Administration has

- Accelerated plans for oil and gas exploration in wildlife refuges in Alaska while proposing a 50 percent cut (from \$8 million to less than \$4 million) in the Alaska Refuge Management Budget for FY 1982.
- Withdrawn final regulations under the Fish and Wildlife Coordination Act that would have elevated the importance of wildlife habitat values in considering federal permits and federally funded projects.

- Systematically cut funding for vegetation inventories, habitat evaluation, instream flow studies, environmental analyses, and other programs to determine the carrying capacity of public lands to support fish and wildlife and to determine the compatibility between energy development and fish and wildlife protection. At the same time, the Administration has added funds for energy development—thereby increasing the need for the studies being cut.
- Put all of BLM's resources for improvement of the public range into areas where ranchers will get first call for red meat production, leaving little for wildlife.

President Reagan personally

- Rescinded a ten-year-old Executive Order issued by President Nixon that banned the use on the public lands of 1080, a highly toxic poison used to kill coyotes and other predators.

EPA had cancelled registration of 1080 as a pesticide and severely limited its use as a rodenticide ten years ago because it poisons nontarget species such as raccoons, badgers, and eagles as well as coyotes. Under the Reagan Administration

- EPA has begun proceedings to re-examine the 1080 ban. EPA Administrator Gorsuch stated that "new information" justified re-opening the issue. A University of California scientist, whose work was cited as the major source of the "new information" has charged that EPA and Gorsuch distorted his findings. "EPA needed some pivotal scientific basis to justify and trigger these hearings," said a spokesman for the University, "so they... misrepresented [the scientist's] statements to justify the hearings."
- The Fish and Wildlife Service applied to EPA to approve 1080 for some uses as a predator poison.

Blocking Acquisition of Refuges. Watt claims credit for acquisition of land for several federal and state refuges, all of which he opposed until he was overruled by Congress. Specifically, the Administration has

- Proposed zero funding from the Land and Water Conservation Fund for wildlife refuge acquisition in FY 1982 and only \$1.6 million in FY 1983 for partial acquisition of endangered species habitat. At least \$54 million is needed from the Fund for buying priority areas, already authorized by Congress for acquisition, to protect them from development and habitat destruction. The two new refuges for which purchase has begun (Bogue Chitto, Louisiana, and Bon Secour, Alabama) were ordered by Congress over Watt's objections.
- Opposed acquisition of privately owned enclaves in refuges in New Jersey, California, and Maine. Congress overruled him.
- Eliminated grants from the Land and Water Conservation Fund for state habitat acquisition.
- Proposed zero funding for wetlands acquisition under the Wetlands Loan Act in FY 1983.

In 1977 the Fish and Wildlife Service identified 1,947,000 acres of wetlands in need of protection under its 10-year duck stamp program.

- The Fish and Wildlife Service purchased only 24,349 acres of wetland—paid for by duck stamps—in the first year of the Reagan Administration. At the Reagan rate of acquisition, it would take 78 years to complete the program. Meanwhile, the nation is losing 600,000 acres of wetland to development every year.
- Watt proposed no new funding for wetlands acquisition under the Wetlands Loan Act in FY 1983. Authority to acquire wetlands under this program expires at the end of FY 1983.

The Administration has announced that it actually intends to divest the National Wildlife Refuge System of a key refuge area. It proposes to

- Transfer National Wildlife Refuge Lands on Matagorda Island to Texas, which wants to use the land for recreation. That use is incompatible with the conservation objectives and special qualities of Matagorda, which provides critical habitat for the highly endangered whooping crane and habitat for several other endangered species.

Cutting Cooperation with States. The Reagan Administration wants to eliminate all federal funding for the Cooperative Wildlife and Fisheries Units. In this program, the Fish and Wildlife Service cooperates with land grant universities and state wildlife agencies in wildlife and fishery research and training. The program trains four out of five of the country's wildlife biologists. Federal funds pay for about one-third of the costs. The Reagan Administration has

- Proposed to cut funding to zero, in both FY 1982 and FY 1983, for the Cooperative Units. Congress restored \$4.4 million for the program in FY 1982.

One positive accomplishment of this Administration is the speedup of the ecological mapping inventory of fish and wildlife resources of the Pacific Coast and a start on mapping of the Gulf Coast.

This solitary accomplishment must be judged against the record, outlined above, of relegating fish and wildlife protection to secondary importance.

"Indictment: The Case Against the Reagan Environmental Record," *Friends of the Earth*. San Francisco, CA, 1982.